

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

TIMOTHY P. NEUMANN, ESQ. [TN6429]  
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*Attorneys for Debtor-in-Possession American Center for  
Civil Justice, Inc.*

In Re:

**AMERICAN CENTER FOR CIVIL JUSTICE, INC.,**

Debtor.

Chapter 11

Case No.: 18-15691

Judge: Christine M. Gravelle

**REPLY TO OBJECTIONS TO DISCLOSURE STATEMENT**

Annexed hereto are an unsigned pro forma modified plan and modified disclosure statement (“Modified Plan Documents”). Two versions of each have been submitted, one with the changes highlighted and another without. These Modified Plan Documents are the Debtor’s attempt to accommodate the objections that have been filed in those instances in which the Debtor acknowledges that the objections are constructive. Also annexed are revenue and expenses projections that support Debtor’s view that it will have future earnings with which to make plan ..... payments.

While it is unrealistic to expect that these suggested revisions will resolve all objections in toto, it is hoped that they will at least reduce the issues to be discussed at the hearing.

Respectfully submitted,

/s/ Timothy P. Neumann  
Timothy P. Neumann